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February 16, 2015  
Via US ECFS

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

RE: UPM Marketing, Inc.  
Form 499 Filer ID: 827634  
Annual Customer Proprietary Network Information Compliance Certification;  
EB Docket No. 06-36

Dear Ms. Dortch,

Enclosed for filing is the Annual Customer Proprietary Network Information ("CPNI") Compliance Certification; EB Docket No. 06-36, filed on behalf of UPM Marketing, Inc.

Please do not hesitate to contact me at 407-260-1011 or [mark@csilongwood.com](mailto:mark@csilongwood.com) if you have any questions or concerns.

Thank you for your assistance in processing this filing.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark G. Lammert", is written over a horizontal line.

Mark G. Lammert, CPA  
Tax Preparer for UPM Marketing, Inc.

cc: UPM Marketing, Inc.  
file: UPM Marketing, Inc.- PUC - FCC

## UPM Telecom Statement of CPNI Procedures and Compliance

UPM Telecom ("UPM Telecom") provides exclusively carrier-to-carrier telecommunications services. It has no end-user customers. Consequently, UPM Telecom does not have a "subscriber" relationship with its customers and does not send "bills" to end-user customers. UPM Telecom does not offer or market its services to the public or to such classes of users as to be effectively available directly to the public. The company provides service only to other carriers. UPM Telecom typically does not obtain the end-user customer's billing name, address or telephone number, or any other information that relates to the quantity, technical configuration, type, or location of a specific end-user customer's service.

UPM Telecom may obtain certain limited information concerning the calls routed through its carrier-to-carrier services. Because UPM Telecom provides exclusively carrier-to-carrier services, it does not use any call detail information that it obtains in the course of providing those services to attempt to market telecommunications services to the general public or any end-user customers.

Moreover, any call detail information obtained by UPM Telecom is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes.

UPM Telecom safeguards from improper use or disclosure by employees the call detail information that UPM Telecom obtains in providing its carrier-to-carrier services. Access to call detail information is limited to certain employees, and those employees are trained to protect call detail information from improper use or disclosure and informed that failure to protect that information will result in appropriate disciplinary action. In addition, UPM Telecom has programs and procedures in place to discover and protect against attempts by third parties to gain unauthorized access to UPM Telecom computers and call detail records. In the event of unauthorized CPNI access, UPM Telecom will notify the requisite law enforcement agencies, and the customer when possible.

UPM Telecom has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches. The company has no information, other than information that has been publicly reported, regarding the processes that pretexters or data brokers are using to attempt to access CPNI.

UPM Telecom did have a breach of its call detail records during the past year. However, this breach did not involve customer data and no CPNI was implicated in the breach. UPM notified the FBI of the breach promptly.

**UPM Telecom**

**Annual CPNI Certification  
47 C.F.R. § 64.2009(e)  
EB Docket No. 06-36**

COMPANY NAME: UPM Telecom

REPORTING PERIOD: January 1, 2014 - December 31, 2014

FILER ID: 827634

OFFICER: Dean Johnson

TITLE: VP Operations

I, Dean Johnson, hereby certify that I am an officer of UPM Telecom ("UPM Telecom") and that I am authorized to make this certification on behalf of UPM Telecom. I have personal knowledge that UPM Telecom has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to UPM Telecom or to any of the information obtained by UPM Telecom. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures UPM Telecom employs to ensure that it complies with the requirements set forth in 47 C.F.R. § 64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to UPM Telecom or to the information obtained by UPM Telecom.

Signed: 

On behalf of UPM Telecom

Date: 2/26/2014